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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TOBIE RAYCHELLE WHIPPLE and
KURT CHRISTENSEN.

Plaintiffs,
vs.

C. R. BARD INCORPORATED and BARD
PERIPHERAL VASCULAR, INC.,

Defendants.

Case No.: 2:19-cv-01883-RFB-BNW

**PLAINTIFFS' FIRST UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTION**

Pursuant to Fed. R. Civ. P 6(b)(1)(B) and L.R. IA 6-1, Plaintiffs hereby move for an order extending until December 2, 2022 by Noon PDT, the time to file a response to Defendants' motion to Strike Derek D. Muehrcke, M.D. [Doc. 80]. This is Plaintiff's first request for an extension of time to respond to this motion which was originally due on November 28, 2022.

Plaintiffs' counsel has conferred with counsel for Defendants regarding the requested extensions. Defendants' counsel does not oppose this motion for extension as long as the response is filed no later than December 2, 2022 by Noon PDT.

1 Plaintiffs request this extension because the undersigned, who was responsible for responding
2 to Defendants' motion, has been undergoing medical treatments that interfered with his ability to
3 respond. The undersigned can submit further details in camera if the Court requests.

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5 DATED this 28th day of November, 2022

Respectfully submitted,

6 BRADLEY, DRENDEL & JEANNEY
7 LOPEZ McHUGH LLP

8 By: Ramon Rossi Lopez
9 Ramon Rossi Lopez
10 Attorneys for Plaintiffs

11 IT IS SO ORDERED:



12
13 RICHARD F. BOULWARE, II
14 United States District Judge

15 DATED this 29th day of November, 2022.
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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2022, the foregoing was electronically filed with the Clerk of the Court using the EM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Ramon Rossi Lopez
Ramon Rossi Lopez

UNITED STATES DISTRICT COURT
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[PROPOSED] ORDER

Upon the Plaintiffs' Unopposed Motion for Extension of Time to File Response to Defendants' Motion to Strike Derek D. Muehrcke, M.D. [Doc. 80], and for good cause appearing,

IT IS HEREBY ORDERED that Plaintiffs' Motion [Doc.] is **GRANTED**.
Plaintiffs shall have until December 2, 2022 at Noon PDT to file their response to Defendants' Motion Strike Derek D. Muehrcke, M.D. (Doc. 80).

The Clerk of the Court is directed to notify counsel of this Order.

DATED this ____ day of November, 2022